

EXHIBIT 15

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION	MDL No. 2804
4	
OPiate LITIGATION	Case No. 17-MD-2804
5	
APPLIES TO ALL CASES	Hon. Dan A. Polster

10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
11 CONFIDENTIALITY REVIEW

15 VIDEOTAPED DEPOSITION of MATTHEW PERRI, III,
16 BS Pharm, Ph.D., RPh, held at Jones Day,
17 1420 Peachtree Street, N.E., Suite 800, Atlanta,
18 Georgia, commencing at 9:28 a.m., on the above date,
before Susan D. Wasilewski, Registered Professional
Reporter, Certified Realtime Reporter and Certified
Realtime Captioner.

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CROSS-EXAMINATION

2 BY MS. RODGERS:

3 Q. Good afternoon, Dr. Perri. My name is Megan
4 Rodgers. We met before the deposition began this
5 morning. I'm with the law firm Covington & Burling,
6 and I'm representing McKesson.

7 A. Okay.

8 Q. You're aware that there are several
9 wholesale distributors in this case, right?

10 A. Yes, I am.

11 Q. Okay. And when I use the phrase "wholesale
12 distributors," you understand I'm referring to
13 McKesson, AmerisourceBergen, and Cardinal, right?

14 A. Are you limiting it to just those three?

15 Q. Can we agree that I'm -- yeah.

16 A. Okay.

17 Q. I'm referring to those three.

18 Were you asked to consider whether you had
19 any opinions with respect to McKesson?

20 A. With respect to McKesson by itself?

21 Q. Yes.

22 A. No.

23 Q. Okay. Were you asked to consider whether
24 you had any opinions with respect to Cardinal?

25 A. Not -- none of the defendants independently.

1 They're all -- the opinions are all based on a
2 collective assessment.

3 Q. Okay. So you have no opinions in this case
4 regarding specifically McKesson?

5 A. None that are related to McKesson only.

6 Q. Okay. And you have no opinions related
7 specifically to Cardinal?

8 A. Same -- nothing is -- while the opinions
9 apply to each of the wholesaler defendants, none of
10 the opinions are specifically singling them out as a
11 particular defendant regarding that opinion.

12 Q. Okay. And the same is true for
13 AmerisourceBergen?

14 A. Yes.

15 Q. Okay. Were you asked to produce materials
16 produced by those wholesale distributors?

17 A. So, yes, there were -- there were wholesale
18 documents -- wholesaler documents that were provided
19 to me, as well as some that I searched for in the
20 Relativity database.

21 Q. Okay. And what was the volume of the
22 materials that --

23 A. The -- as I recall, the largest share of the
24 distributor documents were contracting documents
25 and, for example, documents specifying purchasing

1 increase their efficiency and ability to survive in
2 the marketplace.

3 Q. Okay. And that same paragraph goes on to
4 say: Wholesalers can give preferential treatment to
5 a specific manufacturer's products by stocking only
6 or preferentially selected manufacturer's products
7 for distribution and/or generic purchasing programs.

8 There is nothing wrong with that, either,
9 right?

10 MR. CHALOS: Object to the form.

11 A. So we're still -- we're not on opiates,
12 right?

13 Q. Correct.

14 A. Yes, I agree.

15 Q. While a distributor can set different prices
16 for generics, they're not the ones actually writing
17 the prescription for those medicines, right?

18 MR. CHALOS: Object to the form.

19 A. The wholesalers do not generate patient
20 level demand, no.

21 Q. Okay. It's the doctor that usually makes
22 the decision about whether to prescribe an opioid?

23 A. Doctor or the prescriber, yes.

24 Q. And the prescriber decides which opiate --
25 opioid to prescribe?